

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

HUGHETTE CRUMPLER,	)	CASE NO. C-1-02-131
	)	
Plaintiff,	)	JUDGE SUSAN J. DLOTT
	)	
vs.	)	
	)	
TELXON CORPORATION, et al.,	)	DEFENDANTS' RESPONSES TO
	)	PLAINTIFF'S SECOND SET OF
Defendants/Third-Party	)	INTERROGATORIES
Plaintiffs,	)	
	)	
vs.	)	
	)	
JOHN W. PAXTON, SR.,	)	
	)	
Third-Party Defendant.	)	

Defendants, Telxon Corporation and Symbol Technologies, Inc. (collectively, "Defendants"), for their Responses to Plaintiff, Hughette Crumpler's ("Crumpler"), Second Set of Interrogatories, object and respond as follows:

**GENERAL OBJECTIONS**

Defendants incorporate by reference the General Objections stated in their Response to Plaintiff's First Set of Interrogatories.

**Exhibit D**

**RESPONSES TO INTERROGATORIES**

**INTERROGATORY NO. 1.** Identify each person assisting in the preparation of your answers to these Interrogatories and verifying the same on your behalf.

**RESPONSE:**

See Defendants' verification page, which is attached hereto.

**INTERROGATORY NO. 2.** Provide the following information with respect to each person who may testify at trial on your behalf:

- a) Name, address and telephone number;
- b) Current place of employment, address and telephone number;
- c) Was the person formerly employed by Telxon or Symbol? If so, what was the person's last job title at either Telxon or Symbol prior to the person's termination of employment?
- d) What testimony will be offered by that person on your behalf? In particular, what are the facts and issues that such person will testify about?

**RESPONSE:**

Objection: Defendants do not yet know whom they will call to testify at trial. Defendants will disclose such information pursuant to and in compliance with a Court Order requiring such disclosure.

Respectfully submitted,

OF COUNSEL:

GOODMAN WEISS MILLER LLP



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JAMES S. WERTHEIM (0029464)  
KIMBERLY Y. SMITH (0066849)  
100 Erieview Plaza, 27th Floor  
Cleveland, OH 44114-1882  
(ph.) 216-696-3366 • (fax) 216-363-5835  
wertheim@goodmanweissmiller.com  
smith@goodmanweissmiller.com

Attorneys for Defendants

AS TO OBJECTIONS:



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KIMBERLY Y. SMITH

CERTIFICATE OF SERVICE

A copy of *Defendants' Responses to Plaintiff's Second Set of Interrogatories* was sent by regular U.S. mail, postage prepaid, this 5<sup>th</sup> day of March, 2003, to:

Robert A. McMahon, Esq.  
EBERLY MCMAHON HOCHSCHEID LLC  
3700 Eastern Avenue  
Cincinnati, OH 45226  
**Counsel for Plaintiff Hughette Crumpler**

Michael A. Manzler, Esq.  
Deborah DeLong, Esq.  
DINSMORE & SHOHL LLP  
1900 Chemed Center  
255 East Fifth Street  
Cincinnati, OH 45202  
**Counsel for Third-Party Defendant John W. Paxton, Sr.**



KIMBERLY Y. SMITH

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HUGHETTE CRUMPLER,	)	CASE NO. C-1-02-131
	)	
Plaintiff,	)	JUDGE SUSAN J. DLOTT
	)	
vs.	)	
	)	
TELXON CORPORATION, et al.,	)	
	)	
Defendants/Third-Party	)	
Plaintiffs,	)	<b>VERIFICATION</b>
	)	
vs.	)	
	)	
JOHN W. PAXTON, SR.,	)	
	)	
Third-Party Defendant.	)	

STATE OF NEW YORK     )  
                                  ) SS:  
COUNTY OF SUFFOLK    )

I, LEONARD H. GOLDNER, being first duly sworn, depose and say:

1. That I am the Vice President and General Counsel of Telxon Corporation ("Telxon"), one of the Third-Party Plaintiffs/Defendants in the foregoing action, and that the

foregoing *Defendants' Responses to Plaintiff's Second Set of Interrogatories* were prepared with the assistance and advice of counsel.

2. That the answers have been made upon information believed to be accurate.

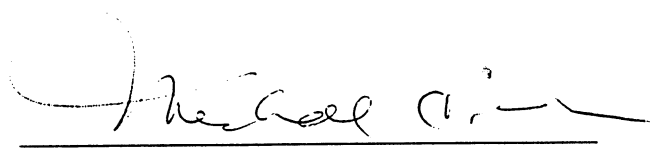
3. That, consequently, Telxon and Symbol reserve the right to make any changes in the answers if it appears at any time that omissions or errors have been made therein and that more accurate information is available.

4. That, subject to limitations hereinabove set forth, the answers are true to the best of my knowledge, information, and belief.

**FURTHER AFFIANT SAYETH NAUGHT.**

  
LEONARD H. GOLDNER

SWORN TO BEFORE ME and subscribed in my presence this 4<sup>th</sup> day of March,  
2003.

  
Notary Public

**MICHAEL C. MILLER**  
Notary Public, State Of New York  
No. 02MI6084529  
Qualified In Nassau County  
Commission Expires December 9, 20 06